



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
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<http://www.blm.gov/nv>

In Reply Refer To:
3100 (NV922)

SEP 13 2017

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DECISION

| | | |
|---------------------------------|---|------------------------------------|
| Center for Biological Diversity | : | Protest to All Parcels in the |
| Michael Saul, Senior Attorney | : | September 12, 2017 |
| 1536 Wynkoop St, Suite 421 | : | Competitive Oil and Gas Lease Sale |
| Denver, CO 80202 | : | |

Protest Dismissed Parcels Offered For Sale

On July 24, 2017, the Bureau of Land Management (BLM), Nevada State Office (NVSO), timely received a protest¹ from the Center for Biological Diversity (CBD). CBD protested all three (3) of the parcels offered in the September 12, 2017 Competitive Oil and Gas Lease Sale (the Sale) and the Battle Mountain District Office's (BMDO) Oil and Gas Lease Sale Determination of NEPA Adequacy (DNA): DOI-BLM-B020-2017-0036-DNA, and the June Oil and Gas Lease Sale Environmental Assessment (June EA) it tiers to: DOI-BLM-NV-B020-2017-0002-EA.²

BACKGROUND

The nominated parcels included land in Federal mineral estate located in the BLM Nevada's BMDO. After the NVSO completed preliminary adjudication³ of the nominated parcels, the NVSO screened each parcel to determine compliance with national and state BLM policies, including BLM's efforts related to the management of Greater Sage Grouse on public lands.

¹ The protest is posted on the BLM website, located at: <https://www.blm.gov/programs/energy-and-minerals/oil-and-gas/leasing/regional-lease-sales/nevada>

² The DNA and EA available at: <https://www.blm.gov/programs/energy-and-minerals/oil-and-gas/leasing/regional-lease-sales/nevada>

³ Preliminary adjudication is the first stage of analysis of nominated lands conducted by the State Office to prepare preliminary sale parcels for Field Office review. During preliminary adjudication, the State Office confirms availability of nominated lands for leasing pursuant to 40 U.S.C. § 181 *et seq.*, 43 CFR 3100 *et seq.*, and BLM policies. Once the State Office completes preliminary adjudication, it consolidates the nominated land available for leasing into a preliminary parcel list to send to the Field Office for NEPA analysis and leasing recommendations.

The DNA tiered to the June EA and the existing Land Use Plan (LUP)⁴, in accordance with the Code of Federal Regulations (CFR) at 40 CFR 1502.20:

Agencies are encouraged to tier their environmental impact statements to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review . . . the subsequent . . . environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action.

The BLM described its purpose and need for the action in the June EA as follows:

1.2 Purpose and Need for Action

Oil and gas leasing is necessary to provide oil and gas companies with new areas to explore and potentially develop. Leasing is authorized under the Mineral Leasing Act of 1920, as amended and modified by subsequent legislation, and regulations found at 43 CFR part 3100. Oil and gas leasing is recognized as an acceptable use of the public lands under FLPMA. BLM authority for leasing public mineral estate for the development of energy resources, including oil and gas, is described in 43 CFR 3160.0-3.

Offering parcels for competitive oil and gas leasing provides for the orderly development of fluid mineral resources under BLM's jurisdiction in a manner consistent with multiple use management and consideration for the natural and cultural resources that may be present. This requires that adequate provisions are included with the leases to protect public health and safety and assure full compliance with the spirit and objectives of NEPA and other federal environmental laws and regulations. This action is being initiated to facilitate Battle Mountain District's implementation of the requirements in Executive Order (EO) 13212 (2001) and the National Energy Policy Act (2005).

The BLM is required by law to consider leasing of areas that have been nominated for lease if leasing is in conformance with the applicable BLM land use plan, in this case the Tonopah RMP (Tonopah Field Office), approved in 1997, or the Shoshone-Eureka RMP (Mt. Lewis Field Office), approved in 1986. The oil and gas parcels addressed in this EA cannot be considered for leasing without supplemental analysis of new information and changes in environmental conditions since these RMPs were approved, such as increased growth, locations of special status species, identification of traditional cultural properties, and recognition of other sensitive resources that were not addressed in the RMPs.

The DNA stated in the NEPA Adequacy Criteria that:

⁴ The Tonopah RMP, approved on October 6, 1997, as amended.

The proposed oil and gas lease parcels are included in the acreage previously analyzed and designated as open for fluid minerals leasing (subject to restrictions in some areas) in the Tonopah RMP. They are very near/adjacent to one of the parcels (# 106) specifically considered in DOI-BLM-NV-B020-2017-0002-EA, have geographic and resource conditions that are sufficiently similar, and would be subject to the same stipulations and lease notices attached to that parcel. Applications for exploration and/or development at specific sites would be subject to additional project-specific, site-specific environmental analysis before ground-disturbing actions would be approved.

The final June EA considered four (4) alternatives:

- The “Proposed Action” alternative, which included offering all 106 nominated parcels with stipulations from the existing RMP that were sent to the BMDO for review as well as one reinstatement.
- The “Partial Deferral Alternative”, which considered offering 58 parcels or portions of parcels consisting of 91,064 acres, while deferring the remaining approximately 104,668 acres pending and RMP update which would develop and apply additional stipulations.
- The “Additional Resource Protection Alternative”, which was developed in response to public and agency comments received on the Draft EA, and considered offering all 106 adjudicated parcels, but with additional resource protection measures including stipulations to mitigate potential resource conflicts with exploration and development; and
- The “No Action” alternative, which considered rejecting all parcels nominated for the lease sale in June 2017. This alternative is included as a baseline for assessing and comparing potential impacts.

On June 22, 2017, the NVSO published a *Notice of Competitive Oil and Gas Internet Lease Sale for September 12, 2017*⁵ (Notice), resulting in a total of three (3) parcels offered for lease. This protest challenges the DNA and all 3 parcels described in the Notice.

ISSUES

CBD participated in the BMDO’s public review of the June EA, and provided comments to which the BMDO responded in Appendix H of the June EA. Several of the CBD’s arguments in the protest are substantially identical to the comments they provided the BMDO during their review of the June EA, or in their protest of the June Lease Sale. As well CBD has incorporated their previous protest of the June Lease Sale into this protest, as such the BLM’s response to the June Lease Sale protest is hereby incorporated into this protest decision.

⁵ The Notice contains a memorandum of general sale information, the final parcel list, and the final stipulations.

CBD's protest generally alleges that the BLM failed to comply with the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321 *et seq.*, the Minerals Leasing Act of 1920, as amended (MLA), 30 U.S.C. § 181 *et seq.*, the Federal Land Policy and Management Act of 1976 (FLPMA), 43 U.S.C. § 1701 *et seq.*, and the Endangered Species Act of 1973, as amended (ESA), 16 U.S.C. § 1531 *et seq.*

The following addresses the CBD's protest related to the September 12 Sale. The BLM has reviewed the CBD's protest in its entirety; the substantive protests are numbered and provided in bold with BLM responses following.

A. BLM's Refusal to Prepare an Environmental Impact Statement of Environmental Assessment Violates the National Environmental Policy Act and Its Implementing Regulations.

BLM Response:

CBD alleges BLM violated NEPA (42 U.S.C. § 4321 *et seq.*) because the "BLM cannot cure the lack of any detailed, contemporary analysis of new leasing in the Railroad Valley through a Determination of NEPA Adequacy".

In accordance with the NEPA Handbook (p.69), "Proposed actions are analyzed in an EA if the actions are not categorically excluded, not covered in an existing environmental document, and not normally subject to an EIS." And (p. 21), "You may use existing environmental analyses to analyze effects associated with a proposed action, when doing so would build on work that has already been done, avoid redundancy, and provide a coherent and logical record of the analytical and decision-making process." An EA is used to determine if the action would have significant effects; if so, the BLM would need to prepare an EIS. An EA may demonstrate that a proposed action would have effects that are significant but could be reduced or avoided through mitigation. *Id.* None of the issues or potential indirect impacts discussed in the June EA meets the "context" and "intensity" considerations for significance as defined in the CEQ regulations at 40 CFR 1508.27.

The June EA does not support the claim that there would be significant impacts from leasing or development, thus automatically requiring an EIS. Based on the geographic location and resources present on nominated parcels, currently available lease stipulations and lease notices were applied to provide mitigation requirements to minimize potential impacts from leasing (DNA at Attachment B). Once lease development is proposed, additional project and site-specific NEPA will be conducted to address any new resource issues and potential impacts specific to the project or site not addressed at the leasing stage.

The proposed action is not highly controversial as defined by the courts which have consistently specified that disagreement must be with respect to the character of the effects on the quality of the human environment in order to be considered to be "controversial" within the meaning of NEPA, rather than a mere matter of the unpopularity of a proposal. See *Como-Falcon Coalition, Inc. v. U.S. Dept. of Labor*, 609 F.2d 342 (8th Cir. 1978), cert. denied, 446 U.S. 936 ("Mere opposition to federal project does not make project controversial so as to require environmental

impact statement.’’) There is not a substantial dispute within federal agencies, the State of Nevada government agencies, or the scientific community as to the effects of oil and gas leasing and development in Nevada, specifically.

The Tonopah RMP developed a conservative Reasonable Foreseeable Development (RFD) scenario for oil and gas exploration and development within the BMDO. Even with new shale-oil drilling technology being deployed in Nevada, none of the disturbance or impact thresholds identified in the RMP have been reached or surpassed, therefore, BLM considers the continuation of oil and gas leasing within the BMDO viable on a case-by-case basis. The level of environmental analysis conducted by BMDO for the Sale is consistent with the NEPA handbook H-1790-1 and the purpose and need for the action.

Per BLM’s, H-1790-1, National Environmental Policy Act (NEPA) Handbook, (Jan. 2008) (p. 55), the definition of “hard look,” is defined as follows: “A *hard look* is a reasoned analysis containing quantitative or detailed qualitative information.

In conformance with federal regulation, reasonable mitigation is required to ensure that the proposed operations minimize adverse impacts to other resources, uses, and users, consistent with granted lease rights. *Id.* The operator “must” conduct operations to minimize adverse effects to surface and subsurface resources, prevent unnecessary surface disturbance, and conform to currently available technology and practice. *Id.* The operator is responsible for protecting cultural and historic resources, endangered species, and surface resources. *Id.* In general, but without site specificity at the lease stage, potential impacts from the use of Hydraulic Fracturing as one type of well stimulation technique are addressed at Sections 2.5, 3.2.4, and Appendix E of the June EA. An analysis of site specific impacts at the lease stage from a possible use of Hydraulic Fracturing on a lease for which an APD has not been submitted or approved would amount to speculation. As BLM explains in the June EA, the right of the leaseholder to use leased lands is subject to specific non-discretionary statutes and lease stipulations. *See* June EA at p.25. If BLM determines impacts are unacceptable, appropriate mitigation is required or the proposal may be denied to prevent unnecessary or undue environmental degradation of resources. *Id.*, at App. H, CBD Responses, and Decision Record, p. 3 (If the [NEPA] evaluation indicates that environmental impacts would be unacceptable, either the project would be modified, mitigation measures would be implemented as conditions of approval (COAs) to reduce the impact, or the proposal could be denied to prevent unnecessary and undue degradation). *See also* BLM, *Onshore Oil and Gas Order No. 1, Approval of Operations*, 72 Fed. Reg. 10308, at 10334 (Mar. 7, 2007) (BLM will...3. Deny the permit if it cannot be approved and the BLM cannot identify any actions that the operator could take that would enable the BLM to issue the permit...).

The above CBD allegation has been considered, found to be without merit and is dismissed.

B. Substantial New Information Exists Regarding Wildlife Resources Within The Area That Would Be Affected By The Proposed Action.

BLM Response:

CBD alleges BLM has failed to consider substantial new information regarding wildlife resources, including a potential new species of toad within the area of the proposed lease sale.

However according to the study CBD cites for this information, the potential new toad species is located in riparian areas and springs, at least 5 miles from the parcels proposed for this lease sale, and on the far side of the Railroad Valley playa which does not provide habitat for the toad species.

As no habitat for this toad species is contained within the proposed parcels, or within a reasonable distance of these parcels for the effects of reasonably foreseeable development of the parcels to have an impact on toad species or its habitat, there has been no newly identified resource or impact that would substantially change the analysis of the proposed action.

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed.

C. BLM's DNA Violates NEPA By Failing to Disclose the Site-Specific Indirect and Cumulative Impacts of Its Proposed Action

BLM Response:

The BLM took a "hard look" at the environmental consequences of leasing in the BMDO in the Tonopah RMP and Final EIS in which a Reasonably Foreseeable Development scenario for Oil and Gas was proposed and evaluated and impacts were disclosed, including the potential impacts from exploration and development. In addition, Chapter 3 of the June EA, Affected Environment and Environmental Consequences addresses the elements that must be reviewed in all environmental analyses, as well as other resources deemed appropriate for evaluation. All resources that may be present or affected in the areas of the proposed parcels were analyzed for potential indirect and cumulative impacts from leasing exploration and development.

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed.

1. BLM does not Consider Potential Impacts to Water Resources in Proposed Sale Area

BLM Response:

The June EA addressed potential impacts to water resources in Sections 3.2.4 and 4.2.4. The analysis determined that there were no significant impacts to water resources from the selected alternative. However, there could be indirect impacts to water resources from oil and gas development on these leases. To reduce potential conflicts with water resources from oil and gas leasing, the BMDO evaluated parcels located within high-value habitat for significant water resources and proposed to apply additional stipulations and mitigation measures to future development activities. Once lease development is proposed, additional project and site-specific NEPA will be conducted to address any water resource issues and potential impacts specific to

the site not addressed at the leasing stage. Furthermore, these activities would be subject to Best Management Practices (BMPs), state and federal regulations, and Conditions of Approval (COAs).

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed.

a. The EA does not analyze impacts to water quantity

BLM Response:

Potential impacts to water quality and quantity from Hydraulic Fracturing are addressed in the June EA and in the Hydraulic Fracturing White Paper (Appendix H). Once lease development is proposed, additional project and site-specific NEPA will be conducted to address any water resource issues and potential impacts specific to the site not addressed at the leasing stage. Additionally any subsequent oil and gas development activities would be subject to all applicable Federal, State, and local laws and regulations including the Clean Water Act, Safe Drinking Water Act, Hazardous Waste regulations, OSHA regulations, and the State of Nevada Hydraulic Fracturing Rules.

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed.

b. The EA does not adequately analyze impacts to wildlife that depend on water features

BLM Response:

The June EA addressed potential impacts to wildlife, including wildlife dependent on water features in Sections 3.2.8 and 4.2.8. The EA analysis determined that there were no significant impacts to wildlife from the selected alternative. However, there could be indirect impacts to wildlife from oil and gas development on these leases. To reduce potential conflicts with wildlife habitat and populations from oil and gas leasing, the BMDO evaluated parcels located within high-value habitat and proposed to apply additional stipulations and mitigation measures to future development activities. Once lease development is proposed, additional project and site-specific NEPA will be conducted to address wildlife issues and potential impacts specific to the site not addressed at the leasing stage. Furthermore, these activities would be subject to Best Management Practices (BMPs), state and federal regulations, and Conditions of Approval (COAs).

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed.

c. The Water Resources Stipulation (#NV-B-10-B-CSU) provides inadequate protection to critical water resources and the wildlife which depend upon them.

BLM Response:

The June EA addressed potential impacts to water resources, and the wildlife dependent on water features in Sections 3.2.4, 3.2.8, 4.2.4 and 4.2.8. The analysis in the EA determined that there were no significant impacts to critical water resources or wildlife from the selected alternative. However, there could be indirect impacts to water resources and wildlife from oil and gas development on these leases. To reduce potential conflicts with water resources and dependent wildlife habitat and populations from oil and gas leasing, the BMDO evaluated parcels containing water resources, or located within high-value habitat and applied additional stipulations including for areas with water resources - requiring additional engineering reviews, and mitigation measures to future development activities. Furthermore, these activities would be subject to Best Management Practices (BMPs), state and federal regulations, and Conditions of Approval (COAs). In the BLM's analysis the combination of existing federal and state laws including the Clean Water Act, the Safe Drinking Water Act, and the Endangered Species Act, as well as existing BMPs and the requirement of additional engineering reviews in sensitive areas will prevent any significant impacts from the Reasonably Foreseeable Development. Once specific lease development is proposed, additional project and site-specific NEPA will be conducted to address critical water and wildlife issues and potential impacts specific to the site not addressed at the leasing stage.

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed.

d. BLM Has Failed to Analyze Impacts to Significant Paleontological Resources

BLM Response:

The June EA addressed potential impacts to paleontological resources in Sections 3.2.3 and 4.2.3. The analysis in the June EA determined that there was low to moderate potential for vertebrate, or significant invertebrate or plant fossils in Railroad Valley, and that the standard stipulations and requirements for oil and gas development with the addition of a Lease Notice for Low to Moderate Potential for fossils including the requirement to immediately stop work and report any discovery to the BLM Authorized Officer and the requirements of the Paleontological Resources Preservation Act, no significant impacts to Paleontological Resources could be expected from the selected alternative. Furthermore, these activities would be subject to Best Management Practices (BMPs), state and federal regulations, and Conditions of Approval (COAs).

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed.

D. BLM's proposed action is arbitrary and capricious because of the unfounded assumption that development is unlikely to occur

BLM Response:

The BLM took a "hard look" at the environmental consequences of leasing in the BMDO in the Tonopah RMP and Final EIS in which a Reasonably Foreseeable Development scenario for Oil and Gas was proposed and evaluated and impacts were disclosed, including the potential impacts from exploration and development. The RFD in the Final EIS does acknowledge that some areas are more likely to be developed based on past activity and known potential. The June EA does not state that development in Railroad Valley is unlikely to occur, it states that given the "wildcat" nature of leasing in Nevada and the unknowns at the lease stage that development of any given parcel is unknown and low at this stage. However, in the June EA all resources that may be present or affected in the areas of the proposed parcels were analyzed for potential indirect and cumulative impacts from leasing exploration and development.

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed.

E. BLM's DNA Relies on an Alternative That Has Never Been Subject to Public Comment**BLM Response:**

In response to comments received from agencies such as USFWS and NDOW and the public the BLM considered a new alternative in the final June EA, the "Additional Resource Protection Alternative". This new alternative applied additional stipulations and lease notices to parcels with important wildlife habitats, or sensitive natural resources via this EA process. During the review of these comments and revision of the June EA, the Additional Resource Protection Alternative was found to meet the BLM's Purpose and Need, while addressing substantive comments received from the public.

Per BLM's, H-1790-1, National Environmental Policy Act Handbook, (Jan. 2008) (p. 30), Section 5.3.2 When Supplementation is Not Appropriate:

Supplementation is not necessary if you make changes in the proposed action that are not substantial (i.e., the effects of the changed proposed action are still within the range of effects analyzed in the draft or final EIS).

If a new alternative is added after the circulation of a draft EIS, supplementation is not necessary if the new alternative lies within the spectrum of alternatives analyzed in the draft EIS or is a minor variation of an alternative analyzed in the draft EIS. In such circumstances, the new alternative may be added in the final EIS.

The Additional Resource Protection Alternative lies within the spectrum of alternatives analyzed in the draft EA. In addition the final June EA and BLM decision have been posted publicly for Public Protest and legal challenge. Therefore, the above CBD protest above has been considered, found to be without merit and is dismissed.

F. BLM Has Failed to Consider Impacts to Endangered and Threatened Species and to Insure that Its Action Will Not Jeopardize their Continued Existence

BLM Response:

The BLM did consider in the June EA all of the Threatened and Endangered Species known to be present on the parcels as well as BLM special status species lists for plants and animals, which includes most if not all of the species referenced by CBD in their protest letter. The BLM also complied with the requirement to consult with the Fish and Wildlife Service in the Tonopah RMP and Final EIS, which included formal consultation with the Service and a Biological Opinion on the threatened and endangered species in the planning area. In the June EA which tiers to the RMP and Final EIS, it states that the BLM can take actions to protect critical habitat for sensitive species that are not on the lists and even not approve actions, if actions are or may be detrimental to the populations. As the June EA states a Lease Notice was attached to all 106 parcels to serve the lessee with notice that the lease and any future activities proposed on it is subject to the Endangered Species Act, and any attendant requirements for additional scrutiny, surveys, and potential mitigation to protect the specie(s) and or the specie's habitat. This lease notice is also applied to the three (3) parcels in the September Sale Notice. Stipulations and Lease Notices, like this one, serve a vital role at the leasing stage by putting the BLM, lessee, and the public on notice that developing this lease may be difficult and may require additional mitigation and conformance.

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed. dismissed.

G. BLM Has Failed to Consider Climate Impacts or Analyze Reasonable Alternatives to Mitigate Those Impacts

BLM Response:

The BLM took a "hard look" at the environmental consequences of leasing in the BMDO, including the potential impacts from exploration and development. Chapter 3 of the June EA, Affected Environment and Environmental Consequences addresses the elements that must be reviewed in all environmental analyses, as well as other resources deemed appropriate for evaluation. All resources that may be present or affected by leasing were analyzed for potential indirect impacts from leasing exploration and development.

The BLM addressed the potential impacts and environmental consequences to air quality, climate change, and greenhouse gases (GHG) in the June EA in sections 3.2.1 (p. 28) and 4.2.1 (p. 99). The potential impacts of GHG from oil and gas operations in Nevada are extremely low, based on the low amount of current production. If production drastically increases in the future, it could increase the affects from GHG, and additional mitigation derived from analysis may be required. Additional analysis on the effects of Hydraulic Fracturing on Air Quality and Human Health and Safety is provided in Hydraulic Fracturing White Paper.

Potential impacts to air quality and climate change from Hydraulic Fracturing are addressed in the June EA and in the referenced Hydraulic Fracturing White Paper. Any subsequent oil and gas development activities would be subject to all applicable Federal, State, and local laws and regulations including the Clean Air Act, Hazardous Waste regulations, and OSHA regulations.

Therefore, the above CBD protest has been considered, found to be without merit and is dismissed.

DECISION

To the extent that CBD has raised any allegations not specifically discussed herein, they have been considered and are found to be without merit. For this reason, and for those previously discussed, CBD's protest of the Sale and the EA is dismissed and all three (3) parcels will be offered for sale on September 12, 2017.

APPEAL INFORMATION

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4 and Form 1842-1 (enclosed). If an appeal is taken, a notice of appeal and/or request for stay must be filed in writing, on paper, in this office, either by mail or personal delivery within 30 days after the date of service. Notices of appeal and/or request for stay that are electronically transmitted (e.g., email, facsimile, or social media) will not be accepted as timely filed. The notice of appeal is considered filed as of the date our office receives the hard copy and places our BLM date stamp on the document.

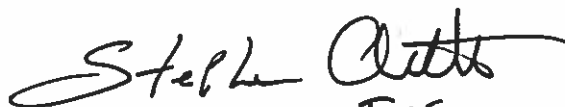
If you wish to file a petition pursuant to regulation 43 CFR 4.21 (58 FR 4939, January 19, 1993) (request) for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate office of the Solicitor (*see* 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

If you have any questions regarding this decision, please contact Brian Amme, Deputy State Director, Minerals Division, at (775) 861-6585.


 Marci L. Todd
 Acting State Director
For Marci L. Todd.

Enclosure:

1- Form 1842-1

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 Lease Sale Book September 2017

Reading File: NV-922